

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**THOMAS C. GOLDSTEIN,**

**Defendant.**

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**CRIMINAL NO. LKG-25-6**

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**DEFENDANT THOMAS C. GOLDSTEIN'S MOTION TO SEAL EXHIBIT TO MOTION  
IN LIMINE**

Defendant Thomas C. Goldstein respectfully requests that this Court order that Exhibit A to his Motion to Preclude Evidence of Uncharged Misconduct and Other Character Evidence be placed under seal. This exhibit, the government's notice under Federal Rule of Evidence 404(b), includes sensitive personal information, including names and other information that would identify potential witnesses in this case. Because the document would be essentially unreadable if confidential information were redacted, Mr. Goldstein seeks leave to file this exhibit under seal, with a sealed copy served on the government.

Accordingly, pursuant to Local Rule 207.2, Mr. Goldstein respectfully requests that the Court approve filing this document under seal.

Dated: October 24, 2025

Respectfully submitted,

/s/ Jonathan Kravis

Jonathan I. Kravis (Bar No. 31556)  
Stephany Reaves (Bar No. 19658)  
Sarah E. Weiner (*pro hac vice*)  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Avenue NW, Suite 500E  
Washington, DC 20001  
(202) 220-1100  
Jonathan.Kravis@mto.com  
Stephany.Reaves@mto.com  
Sarah.Weiner@mto.com

Adeel Mohammadi (*pro hac vice*)  
MUNGER, TOLLES & OLSON LLP  
350 S. Grand Avenue, 50th Floor  
Los Angeles, CA 90071  
(213) 683-9100  
Adeel.Mohammadi@mto.com

*Attorneys for Defendant Thomas Goldstein*